

# Exhibit B

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

JANE DOE 1, <i>et al</i> ,	§ Civil Action No. 6:16-CV-00173-RP
	§
Plaintiffs,	§ Consolidated with
	§ 6:17-CV-228-RP
v.	§ 6:17-CV-236-RP
	§
BAYLOR UNIVERSITY,	§
	§
Defendant.	§

**DECLARATION OF TODD RANTA**

1. My name is Todd Ranta, and I am a Partner at PricewaterhouseCoopers Advisory Services LLC (“PwC”). I am over 18 years of age, of sound mind, and I am competent to testify to the matters stated in this declaration based upon my personal knowledge.
2. I have over 20 years of experience in the areas of computer forensics, electronic discovery and data analysis. I have provided information technology consulting services to U.S. and international based clients on various projects including: corporate investigations, litigation, and large-scale data analysis.

3. In 2017 and 2019, PwC was engaged by Thompson & Horton LLP and Weisbart Springer Hayes LLP, respectively, to provide e-discovery services in the above captioned matters. The PwC services include collecting data from personal computers, email, and mobile devices, hosting files in a managed document review platform (“Baylor’s Production Database”), processing, searching, and producing data in a usable form. Thompson & Horton and Weisbart Springer Hayes utilize the Baylor Production Database to review and identify documents for production pursuant to the Court’s orders and ESI protocol.
4. Per the Court’s order dated February 21, 2023, we understand that the Court has required the entire Pepper Hamilton universe be produced to Plaintiffs. At the direction of counsel, PwC identified this Pepper Hamilton universe in our possession which includes any document with "PH" or "PH2" bates that has been previously produced or logged. Previously redacted text and withheld documents have been restored to the production; that is, the previously redacted or withheld documents have been prepared for a new production without redaction. No confidentiality branding was applied to the new production. The following Pepper Hamilton universe productions were delivered to Thompson & Horton:

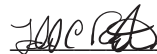
No	Production Name	Original First Bates Nr.	Original Last Bates Nr.	First Bates Nr.	Last Bates Nr.	Document Count	Original Image Count	Image Count
01	Order 1090 - PH2VOL0001	PH2_0000001	PH2_0055982	PH2_0000001	PH2_0055982	6,056	55,982	55,982
02	Order 1090 - SMS - PHVOL0001	PH_0028133	PH_3275175	PH_0028133	PH_3275175	876,713	25,009	30,342
03	Order 1090 - PHVOL0001	PH_0000001	PH_1228016	PH_0000001	PH_1228016	63,563	63,563	63,563
04	Order 1090 - PHVOL0002	PH_1228017	PH_3275219	PH_1228017	PH_3275219	62,913	62,913	62,913
05	Order 1090 - PHVOL0003	PH_0000007	PH_0396403	PH_0000007	PH_0396403	61,276	291,646	288,606
06	Order 1090 - PHVOL0004	PH_0396404	PH_0905935	PH_0396404	PH_0905935	59,800	414,163	414,163
07	Order 1090 - PHVOL0005	PH_0905936	PH_1509358	PH_0905936	PH_1509358	58,009	484,223	484,223
08	Order 1090 - PHVOL0006	PH_1509359	PH_1962733	PH_1509359	PH_1962733	58,309	396,791	396,791
09	Order 1090 - PHVOL0007	PH_1962738	PH_3275233	PH_1962738	PH_3275233	51,555	363,259	363,259
10	Order 1090 - PHVOL0008	PH_0396909	PH_3203891	PH_0396909	PH_3203873	7,801	196,513	17,990
11	Order 1090 - PHVOL0009	PH_0013068	PH_3275252	PH_0013068	PH_3275252	2,713	29,425	19,582
12	Order 1090 - PHVOL0010	PH_0389267	PH_3151399	PH_0389267	PH_3151399.002	75	559	1,089
13	Order 1090 - PHVOL0011	PH_2834966	PH_3201203	PH_2834966	PH_3201203	2,371	5,779	20,271
14	Order 1090 - HCVOL0001	PH_3190698	PH_3190857.0002	PH_3190698	PH_3190857.0002	15,593	109,795	109,795
15	Order 1090 - HCVOL0002	PH_3190711	PH_3190848.0729	PH_3190711	PH_3190848.0729	891	5,830	5,830
16	Order 1090 - HCVOL0003	PH_3190829	PH_3190842.0229	PH_3190829	PH_3190842.0229	73	602	602
Totals:						1,327,711	2,506,052	2,335,001

The Pepper Hamilton universe production bates range (number of pages) may vary from previously produced (or logged) bates ranges due to the following circumstances:

- i. Previous productions included multi-page imaged documents. For many of these documents (primarily redacted excel spreadsheets and powerpoint presentations), we inserted a single, bates-numbered slipsheet in the production and then delivered the affiliated native file, thus lowering the bates counts for that set. Native files did not carry a bates number.
- ii. The previous productions included single-page slipsheeted documents when there were privilege withholds or potentially unprocessable files. Since these documents were produced in the new production with full images, this may increase the bates counts for these documents.
- iii. The re-imaging of a document changed the total image count of that document.

Total documents produced under this Court order is 1,326,747.

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.



Todd Ranta

March 30, 2023

Date